

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF ROOPAL P.  
LUHANA IN SUPPORT OF CHAFFIN  
LUHANA LLP'S OPPOSITION TO  
UBER'S MOTION FOR ENTRY TO  
SHOW CAUSE**

This Document Relates to:  
  
ALL CASES

I, Roopal P. Luhana, declare:

1. I am an attorney and partner in the law firm of Chaffin Luhana LLP. I am a member of the State Bar of New York and am admitted Pro Hac Vice to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. On July 30, 2025, the parties met and conferred regarding Uber's motion related to potentially non-bona fide ride receipts.

3. During that meet and confer, Uber raised specific concerns about Plaintiffs 3038's and 3425's ride receipts. Upon learning this, undersigned counsel requested additional time to investigate Uber's allegations and to speak with the Plaintiffs to discuss what Uber shared for the first time during the meet and confer.

4. Plaintiffs further asked Uber to provide information about any steps it took to locate the disputed receipts and/or rides on its platform.

5. Uber rejected both requests and filed its Motion for an Order to Show Cause, which included Plaintiffs 3038 and 3425, hours later.

6. Plaintiffs asked Uber's counsel questions regarding what searches Uber did to verify (or not verify) the ride receipts at issue existed in its system.

Executed this 27th day of August, 2025, in New York, New York.

/s/ Roopal P. Luhana

Roopal P. Luhana